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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 MAX RUHLMANN and ERIC SAMBOLD,
11 Plaintiffs,

12 v.

13 GLENN RUDOLFSKY, individually and DBA
HOUSE OF DREAMS KAUAI and HOUSE OF
14 DREAMS HAWAII; KIM D. RUDOLFSKY,
AKA KIMI DAPOLITO, individually; and DBA
15 HOUSE OF DREAMS KAUAI and HOUSE OF
DREAMS HAWAII
16 Defendants.

CASE NO.: 2:14-cv-00879-RFB-NJK

**PROPOSED
DISCOVERY PLAN AND
SCHEDULING ORDER SUBMITTED
IN COMPLIANCE WITH LR 26-1(b)**

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18 Plaintiffs, MAX RUHLMANN and ERIC SAMBOLD, by and through their undersigned
19 counsel, hereby respectfully submit a proposed Discovery Plan and Scheduling Order pursuant to
20 LR 26-1(d). THIS PLAN IS SUBMITTED IN COMPLIANCE WITH LR 26-1(e).

21 A. The parties conferred by letter dated May 10, 2016 and emails dated May 20, 2016,
22 May 23, 2016 and May 24, 2016 as required by Fed. R. Civ. P. 26(f). Counsel for the Plaintiffs
23 called Mr. Rudolfsky on May 24, 2016. On May 24, 2016, at 3 p.m. PST, the Rudolfskys
24 submitted a proposed written plan, a copy of which is attached hereto and incorporated herein.
25 Plaintiffs agree to certain dates proposed by the Defendants as set forth herein, and disagree as to
26 other dates.

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2 B. Discovery Dates:

3 1. Date for Initial Disclosures: (Agreed)

4 The Plaintiffs agree to Defendants' proposed date for Initial Disclosures of July 30, 2016.

5 2. Discovery Cut-Off Date: (Disputed)

6 Plaintiffs propose that the parties shall have one hundred eighty (180) days from the date
7 this report is filed in which to complete discovery.

8 Defendants propose that the parties shall have two hundred seventy days (270) from the
9 date this report is filed in which to complete discovery.

10 3. Amending the Pleadings and Adding Parties: (Agreed)

11 Plaintiffs agree with Defendants' proposal that the last date for filing motions to amend
12 the pleadings or add parties shall be no later than sixty (60) days prior to the close of discovery.

13 4. FRCP 26(a)(2) Disclosures (Experts): (Partially Agreed, Partially Disputed)

14 The Plaintiffs agree with the Defendants that the last date for disclosure of expert
15 witnesses shall be sixty (60) days before the close of discovery.

16 Plaintiffs propose that disclosures respecting rebuttal experts be made within thirty (30)
17 days after the initial disclosure of experts. Defendants propose that disclosures respecting
18 rebuttal experts shall be made within sixty (60) days after the initial disclosure of experts.

19 5. Dispositive Motions: (Agreed)

20 The Plaintiffs agree with the Defendants' proposal that the last date for filing dispositive
21 motions shall be not later than thirty (30) days after the discovery cut-off date.

22 6. Pretrial Order: (Disputed)

23 The Plaintiffs propose that the Joint Pretrial Order shall be filed within thirty (30) days of
24 the date set for filing of dispositive motions.

1 The Defendants propose that the Joint Pretrial Order shall be filed within ninety (90) days
2 of the date set for filing of dispositive motions.

3 7. FRCP 26 (A)(3) Disclosures: (Disputed)

4 Plaintiffs propose that the disclosures required by FRCP 26(A)(3) and any objections
5 thereto shall be included in the pre-trial order.

6 The Defendants request an additional fourteen (14) days to respond to Plaintiffs' proposal
7 regarding FRCP 26(A)(3) disclosures.

8 DATED this 24th day of May, 2016.

9 By: 

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17 IT IS SO ORDERED. LR 26-1(b)(10).

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20 _____
21 NANCY J. KOPPE
22 United States Magistrate Judge
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